

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Consumer Information and Disclosure)	CG Docket No. 09-158
)	
Truth-in-Billing and Billing Format)	CC Docket No. 98-170
)	
IP-Enabled Services)	WC Docket No. 04-36

COMMENTS OF COMCAST CORPORATION

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TABLE OF CONTENTS

	<u>Page</u>
SUMMARY	iii
I. INFORMATION DISCLOSURES ARE CRITICAL TO COMCAST’S ABILITY TO ATTRACT AND RETAIN CUSTOMERS IN AN INTENSELY COMPETITIVE COMMUNICATIONS MARKETPLACE.....	1
II. COMCAST’S INFORMATION DISCLOSURE PRACTICES ARE CUSTOMER-FRIENDLY AND CUSTOMER-FOCUSED.....	4
A. Marketing And Advertising Disclosure Practices.....	5
B. Point-Of-Sale Disclosure Practices.....	8
1. Phone Sales.	8
2. Website Sales.	10
3. Additional Sources of Information.....	11
C. Billing Practices.....	12
D. Customer Complaint And Dispute Resolution Practices.	15
1. Comcast Has Invested Substantial Resources In Improving Our Customer Care Practices.....	15
2. Comcast Is Using Innovative New Technologies And Systems To Answer Questions, Fix Problems, And Respond To Customers’ Needs.	17
E. Customer Requests To Downgrade Or Terminate Service.....	20
III. THE COMMISSION SHOULD MAINTAIN A LIGHT REGULATORY TOUCH IN THIS AREA.....	20
A. The Commission Has A Constructive Role To Play.	20
B. The Commission Should Exercise Restraint In Light Of Marketplace Incentives And Existing Regulations.....	23
C. Mandating Further Disclosures Risks Doing Consumers More Harm Than Good.	27
D. A Cautious Approach Is Also Warranted Due To Jurisdictional And First Amendment Considerations.	29
IV. CONCLUSION	31

SUMMARY

The Notice of Inquiry seeks to gather more data on the information disclosure practices of providers of video, data, and voice services. Comcast takes this opportunity to provide the Commission with an overview of Comcast's practices in this area. We agree with the goal of ensuring that consumers receive clear, accurate, and usable information about the products and services available to them, and we place the highest importance on meeting that consumer need.

The extremely competitive marketplace for video, data, and voice services demands that Comcast provide our customers with timely, accurate, and complete information. Ensuring customer satisfaction is essential for retaining existing customers and attracting new ones, especially in a world where consumers' video, data, and voice service choices are continually expanding.

In a continuing effort to improve, Comcast initiated a company-wide effort over a year ago to re-focus on how we interact with customers. Our customers told us that we needed to do better, and we are changing fundamentally the way we do business in order to improve customer satisfaction. A key component of that improved consumer interaction is our effort to provide more information about our products and services in a more useful and consumer-friendly form than ever before.

Comcast utilizes comprehensive and clear information disclosure practices at all stages of the customer relationship. As explained more fully below, marketing and advertising materials are designed to provide consumers with accurate and important information to allow them to distinguish among various products and services in the marketplace. Comcast's point-of-sale disclosures are complete; all material terms and conditions are disclosed, including details about promotional pricing, bundled services, and other key issues. Comcast customers receive billing statements that we have recently re-designed to highlight more effectively all important

information and that are formatted to reduce instances of consumer confusion. Comcast has invested heavily in providing multiple avenues for customers with questions or problems concerning their service(s) to obtain additional information or issue resolution 24 hours a day, 365 days a year. Finally, Comcast works with customers who may want to terminate service to ensure that process occurs smoothly. For all aspects of customer communications, Comcast is embracing the use of technology and alternative communication methods as effective tools to facilitate efficient and beneficial communication with customers.

Given the robust amount of information available in the marketplace and the competitive forces that require providers to disclose clear information, the Commission should maintain a light regulatory touch in this area. The Commission can play a constructive role in facilitating the flow of information to customers -- for example, by continuing its own consumer education efforts, facilitating the flow of consumer inquiries to providers for prompt response, and encouraging the use of web-based communications. It is also important for the Commission to consider the types of information disclosures that providers of Internet applications make to their customers (particularly as those applications become competitive with or substitutable for services provided by facilities-based competitors) and assess whether those practices are consistent with the Commission's policies on protecting consumer interests. Overall, given the amount of disclosure that facilities-based providers of communications services already provide - - and the existing legal and regulatory frameworks to ensure that it continues in an appropriate way -- the Commission should exercise restraint in this area. A cautious approach also is warranted in light of the rapid evolution of technologies used to deliver video, data, and voice services, and the ongoing changes in providers' product and service offerings in this dynamic marketplace.

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COMMENTS OF COMCAST CORPORATION

Comcast Corporation (“Comcast”) hereby responds to the above-captioned Notice of Inquiry.¹ As detailed below, in a highly competitive marketplace for video, data, and voice services, Comcast has strong incentives to provide customers with detailed information about our service offerings, and does in fact provide such information in a variety of ways to customers and potential customers. In light of these marketplace realities, and existing federal and state regulations over customer disclosures, the Commission should exercise restraint in this area.

I. INFORMATION DISCLOSURES ARE CRITICAL TO COMCAST’S ABILITY TO ATTRACT AND RETAIN CUSTOMERS IN AN INTENSELY COMPETITIVE COMMUNICATIONS MARKETPLACE.

Comcast understands that building positive relationships with consumers is essential for any provider that wishes to attract and retain customers in a fiercely competitive marketplace for

¹ See *In the Matter of Consumer Information and Disclosure; Truth-in-Billing and Billing Format; IP-Enabled Services*, Notice of Inquiry, 24 FCC Rcd. 11380 (2009) (“Notice” or “NOI”).

video, data, and voice services.² Comcast values each and every customer and has strong incentives to provide all customers with useful, timely, accurate, and complete information about all of our products and services at every stage of the customer relationship.³ We understand that if customers (or potential customers) are confused about the products they receive (or are interested in receiving) or unhappy with the services and support offered by one provider, they easily can switch to another provider for every one of the services we offer.

Over a year ago, Comcast initiated a company-wide effort to reevaluate our interaction with customers. We listened to our customers, and they told us that we needed to do better. We assessed all aspects of our service -- including people, processes, systems, technology, and communications materials -- to identify issues and make the significant operational changes to our business that were needed. In response, we dedicated, and continue to dedicate, substantial company resources to improving our customer communications. We also are investing heavily in extensive customer outreach initiatives, such as surveys and focus groups, that allow Comcast to communicate directly with, and receive feedback from, more than *one million* of our customers each year.⁴ This crucial feedback is used to improve the customer experience,

² Comcast faces competition in all lines of business, including video, voice, and high-speed Internet, as the telephone companies and other providers are now participating in each of these markets. For instance, with respect to the video marketplace, the vast majority of consumers now have a choice of three multi-channel video programming distributors ("MVPDs"), and many have four or more, including the two DBS operators (DirecTV and Dish Network) and a competing cable company, such as Verizon's FiOS service or AT&T's U-verse service. In the voice marketplace, we face competition from incumbent telephone companies, competitive LECs, wireless providers, and various Internet-based services. Similarly, in the marketplace for data services, we compete with the telephone companies, wireless broadband providers, power companies, and various other Internet service providers.

³ See, e.g., Howard Beales *et al.*, *The Efficient Regulation of Consumer Information*, 24 J. OF L. & ECON. 491, 502 (1981) (noting that to keep up with the information disclosures of their competitors, "sellers have a substantial economic incentive to disseminate information to consumers").

⁴ These include, among other things: general customer satisfaction surveys that are conducted monthly over all markets (approximately 180,000 such surveys are completed each year); surveys focused on the customer service (footnote continued...)

including marketing, initiation of service, managing of service, billing and other disclosures, resolution of any complaints, and termination of service. When Comcast observes negative trends in these data, proactive measures are taken to resolve problems and prevent similar problems from recurring.

Comcast also now stands behind our products and services with the Comcast Customer Guarantee.⁵ The Guarantee, which was developed with customer input, is intended to assure our residential customers that, among other things, their questions will be answered at their convenience; they will be provided with easy-to-understand packages and a clear bill; and any problems they experience will be quickly addressed. This pledge is backed with a 30-day money-back guarantee for each of our services.⁶ The Customer Guarantee is Comcast's promise that we will hold our products, customer service, and employees to the highest standards and that our goal is to provide a superior customer experience the first time, and every time.

We realize that improvements to our customer communications will take time, but we are steadily making progress -- something we must do to remain competitive. We respond more quickly and more effectively to customer concerns and provide as much information as possible to our customers via our website, mailings, and other communications methods. These

(...footnote continued)

experiences of Comcast customers (approximately 200,000 such surveys are conducted each year); and national surveys that focus on customer satisfaction with respect to each of Comcast's products. Also, a large portion of new customers are called to ensure that their new services are working properly.

⁵ The Comcast Customer Guarantee has recently been introduced in all markets across the country.

⁶ See Attachment A (containing the Comcast Customer Guarantee) ("If you're not satisfied and wish to cancel service for any reason, you can do so in the first 30 days and get your money back. Simply return all equipment in good working order and we'll refund the monthly recurring fee for your first 30 days of service and any charges you paid for standard installation."); *see also* Comcast Customer Guarantee, at <http://www.comcast.com/corporate/Customers/CustomerGuarantee.html>.

improvements are reflected in the declining number of customer complaints and inquiries and the higher customer satisfaction scores Comcast is receiving.

Of course, Comcast is not content with any level of customer dissatisfaction. We have more than 350 million interactions with customers each year, and our goal is to satisfy our customers each and every time. However, we recognize that sometimes things do not go as planned. When that happens, it is important for our customers to know that we will work quickly to resolve any issues and also use that experience to determine and fix the root causes of the problem. Recent innovations in technology also mean that we are better able proactively to identify and correct problems before a customer ever has a service interruption and has to call us.

Comcast recognizes that managing our relationships with our customers is not a static process. We constantly are looking for new and innovative ways to improve the customer experience, respond to customer needs, and empower customers to make informed decisions regarding their service. We will continue to invest substantial resources to ensure that customer relationships are positive and that our customers value the services and products we provide.

II. COMCAST'S INFORMATION DISCLOSURE PRACTICES ARE CUSTOMER-FRIENDLY AND CUSTOMER-FOCUSED.

The NOI invites comment about information disclosures to consumers at all stages of the customer relationship. Comcast describes below our information disclosure practices and customer interactions with respect to marketing and advertising, point-of-sale, billing, dispute resolution, and the termination of service. Comcast also details additional technological innovations we are employing to give customers and potential customers more control in selecting and managing their service plans.

A. Marketing And Advertising Disclosure Practices.

Comcast is committed to providing clear and accurate marketing and advertising materials. Comcast's approach to marketing is simple and straightforward: advertisements must contain all material terms of an offer and describe the information that is most relevant and of interest to consumers. Where appropriate, customers are directed to additional sources where they can obtain complete and detailed disclosure of all terms of an offer.

Every segment of the communications industry is extremely vibrant and dynamic. Comcast's advertisements must reflect this reality and are, therefore, continually updated to address new pricing and services and to respond directly to competitors. Ads typically focus on the features that customers find most helpful for understanding the service and distinguishing among various service providers' options. For example, with respect to our high-speed Internet service, our advertisements typically focus on price and provisioned connection speeds because these are the key facts that consumers tell us they want to know. Comcast's decades of experience in serving the needs of millions of customers helps us make informed decisions about what information is most important and helpful to consumers.

In addition, Comcast conducts focus groups and consumer research to determine what messages resonate with customers and what information consumers want in order to make informed choices about communication services. Comcast also researches each product or service we plan to offer or are offering and designs disclosures and descriptions accordingly. This ensures that Comcast is responsive to consumer preferences; rather than guess at customer

information needs or burden them with information they find irrelevant or unimportant, Comcast is able to target communications based on direct customer feedback.⁷

The wide variety of choices that Comcast provides to customers means that advertisements may not include *all* possible information that any particular consumer may theoretically want to know.⁸ In a competitive marketplace with dynamic marketing practices and varying consumer needs, it is not feasible to describe all possible scenarios that may apply to a given offer. For example, in the video context alone, our company offers multiple service tiers, including family, sports, and ethnic tiers; many premium channels are offered for individual purchase; and equipment options include buying or leasing equipment, high-definition or standard-definition set-top boxes, set-top equipment with or without DVR capability, and whether to use multiple set-top boxes. Likewise, customers may select from a variety of voice and high-speed Internet service plans and features. While the base rate disclosed in ads is universally applicable, the numerous choices we provide to consumers make it impossible to provide a single “total” price that applies to every consumer.

Rather than risk obscuring the most important consumer information with an overwhelming amount of detail and complex pricing information that would apply to various packages that may or may not interest or assist a particular consumer, Comcast makes clear that equipment and other fees or limitations may apply, and offers ready access to complete

⁷ This constant consumer feedback ensures that Comcast is keeping up with any changed marketplace conditions or changed consumer preferences. For example, if customers become interested in receiving certain information about a product to help them evaluate it and compare it to other offerings, Comcast can adjust its marketing and advertising materials accordingly to satisfy that demand.

⁸ Apart from practical constraints, customers tell us in surveys, focus groups, and other communications that they want simple, straight-forward, and easy-to-understand descriptions. Comcast frequently revises and updates product descriptions to match consumers’ preferences for clear information.

information online or by calling Comcast.⁹ This approach is widely employed by communications providers, and it works: customers get the information they most want up front, are advised that additional terms apply, and are provided with easy access to those additional terms. Moreover, as explained below, point-of-sale communications include complete disclosure so that consumers are aware of their options and commitments before purchasing any service.

Marketplace forces also serve to discipline the marketing practices of Comcast and other providers. There is fierce competition across all of Comcast's product offerings. If expectations about prices or services are not met, Comcast risks losing customers to competitors. Therefore, we strive to provide accurate advertisements that meet both the expectations and needs of customers and prospective customers. In addition, competition serves as an effective check on a provider's information and marketing claims. Providers routinely scrutinize the claims of their competitors, and even resort to challenging advertisements at the National Advertising Division of the Council of Better Business Bureaus¹⁰ and in court.¹¹ And, of course, there are third-party sources of comparative information that provide a constant stream of information about consumers' options.¹²

⁹ Printed advertisements for bundled services, for example, notify consumers that the promotional rate applies for a certain time period and only so long as the consumer receives all included services.

¹⁰ See National Advertising Division, at <http://www.nadreview.org/>.

¹¹ See, e.g., Todd Spangler, *Time Warner Cable Sues DirecTV*, Multichannel News, Dec. 8, 2006, available at http://www.multichannel.com/article/85452-Time_Warner_Cable_Sues_DirecTV.php; see also Todd Spangler, *Judge Bars DirecTV HD Ads*, Multichannel News, Feb. 5, 2007, available at http://www.multichannel.com/article/84684-Judge_Bars_DirecTV_HD_Ads.php; Yinka Adegoke, *Bankrupt Charter Sues DirecTV for 'false' Ads*, Reuters, May 12, 2009, available at <http://www.reuters.com/article/mediaNews/idUSN1233483820090512>.

¹² See Section III.B, *infra*.

B. Point-Of-Sale Disclosure Practices.

Comcast makes abundant information regarding our services available at the point of sale to potential customers, including detailed pricing information and any terms and conditions applicable to particular service options. Comcast aims to ensure that all new customers receive clear descriptions of the material terms of all offers, service plans, bundled services, and other key issues.

Comcast also is working continually to improve our point of sale contacts with consumers. Comcast's Marketing Sciences Group, for example, conducts both internal and external focus group sessions. Customer Account Executives ("CAEs") in markets across the country are interviewed about what trends and common themes they hear from customers in order to better understand and improve the customer's experience of subscribing to a Comcast service. In addition, customers are asked about their experiences through surveys and focus groups. Comcast's training and practices are adjusted based on this feedback.

1. Phone Sales.

The vast majority of Comcast's residential service sales (roughly 80%) occur via a customer phone call to a Comcast call center, most often in response to advertisements in which material terms and conditions have been disclosed. While certain details (such as pricing, taxes, and fees) may vary by market, all CAEs are trained to provide clear and succinct descriptions of all key features of a customer's new service plan, and market-specific information is provided to customers, as appropriate. Comcast trains its CAEs to disclose the following information during a sales call:

- *Pricing.* New customers are informed about the price of the service(s) they have selected and are provided information about applicable taxes and fees (which typically vary by market). They are told that the first bill will contain pro-rated

charges based on a partial month of service, applicable one-time fees, such as installation charges, and charges for the first full month of service. Customers are also told when to expect the first “regular” bill and are told what that normal, recurring amount for services and equipment will be. This ensures that customers know the total cost of their services and equipment and that the first bill a customer receives matches his or her expectations.

- *Promotional Pricing.* If applicable, customers are told the promotional price of any service they have selected and the term during which such discounted price will apply. CAEs are also trained to tell the customer when the non-promotional rate will take effect and to give an estimate of that rate based upon current charges. This disclosure also is made in Comcast’s print and web-based advertising for all promotions.¹³
- *Bundled Services.* Customers who choose a bundle of services are clearly informed that they must continue to subscribe to all services in the bundle in order to continue receiving the promotional/discounted price. Customers are advised that they will pay the regular retail rate if they choose to “break” the bundle. This disclosure also is made in Comcast’s advertising.
- *Minimum Term Agreements.* Customers are explicitly told about the conditions that attach to a minimum-term agreement, including any fees for early termination of such agreement. Customers have a 30-day rescission right from the date of service activation on any minimum-term agreement.
- *Equipment.* CAEs are trained to speak knowledgeably to customers about the equipment options available to them, including the customer’s option to lease or buy equipment and whether particular devices are compatible with Comcast’s services.

Comcast ensures that information regarding our services and pricing is accessible to people with disabilities. Comcast works with telecommunications relay services (“TRS”) providers to ensure that all hearing-impaired customers can effectively and efficiently communicate with our CAEs. Hearing-impaired customers have access to the same information as all other customers.

¹³ Due to time constraints, and consistent with arrangements Comcast has reached with various attorneys general, TV and radio disclaimers are often less robust than those in print, although these disclaimers state that regular charges will apply after the promotional period.

2. Website Sales.

Customers who purchase services on Comcast's website also receive detailed information about plans, promotional periods, bundled services, and other important terms. This information largely tracks what customers obtain through Comcast's advertisements and by speaking directly to a CAE. Comcast.com is designed to provide consumers with current, useful information about products and services, organized in a clear and easy-to-understand format. Comcast's customer research confirms that the vast majority of customers make decisions based on a few key features (value and price, for example), and Comcast's web interface is designed with this in mind. Moreover, the distinguishing characteristics of each of Comcast's service options are prominently displayed so that customers can understand the differences among various options.

Full terms and conditions associated with any service are available through prominent links labeled "Terms and Conditions" and "Learn More," meaning that complete information is just one click away.¹⁴ It is not feasible -- or helpful to consumers -- to overload each page with all possible information about Comcast products. In fact, Comcast's customers have told us in surveys and focus groups that, when too much information is presented on a page, they become confused or frustrated and opt to call Comcast instead of completing the purchasing process online. To avoid this problem and to maintain the convenience of online ordering, Comcast's website, like other Comcast materials, presents information that consumers need and want, with more information readily available for those who want to know more.¹⁵

¹⁴ In the high-speed Internet context, Comcast provides information about download and upload speeds via the "Learn More" link. Comcast also makes detailed technical information about its network available to those customers who want it. See Network Management Policy, at <http://www.comcast.net/networkmanagement>.

¹⁵ Consumers may not always find more information useful, particularly in a marketplace where competition is fierce and an abundance of information is available. "Merely finding that consumers lack certain information (footnote continued...)"

The conditions associated with promotional prices are clearly displayed. Any promotional pricing information is accompanied by the “roll-off” rate that is anticipated to apply once the promotion ends (calculated based on current rates).¹⁶ Consumers have told us that this allows them to make informed decisions about the appropriate service plan and long-term pricing. In addition, bundled service options are clearly described, and the services included and the total price are prominently displayed.

Before completing a purchase online, a customer is presented with a summary page that allows the customer to see a description of the service(s) selected, pricing information (including a description of any applicable difference in price for the first month’s bill due to one-time installation or other costs), and promotional pricing information (including the applicable roll-off price).¹⁷ This ensures that the customer understands the service(s) that he or she is purchasing. In addition, the customer has the opportunity to speak with a CAE -- via a live online chat session or a phone call -- to complete the transaction. This allows a customer to review the key terms with a CAE if so desired.

3. Additional Sources of Information.

Above and beyond the disclosures made at the point of sale, we provide customers with additional confirmation of the material terms of all new services they have purchased. The

(...footnote continued)

does not imply that that information ought to be disclosed in some way, for it could be that the information has not been disclosed because it is expensive to produce and of little value to consumers.” Howard Beales et al., *supra* note 3, at 538.

¹⁶ See Attachment B (a screen shot of www.comcast.com that shows the promotional rate, the length of the promotion, and the “roll-off” rate expected to apply after the promotion expires).

¹⁷ See Attachment C (a screen shot of the summary page an online shopper sees before being able to complete his or her transaction).

service technician who installs the necessary equipment and activates the service at the customer's home is required to review the services and applicable rates with the customer.

Customers also receive a "Welcome Kit" that contains, among other things, detailed information on Comcast's products and services, contact information, troubleshooting tips, Comcast's privacy policy and customer terms of service, and information on how to use Comcast's program guide, voice mail services, e-mail accounts, and other key service features. The Welcome Kit also contains Comcast's Customer Guarantee. Welcome Kits are tailored to provide relevant information about the particular service(s) to which the customer has subscribed.

C. Billing Practices.

Comcast's customer responsiveness also is reflected in the recent re-design of our billing statements. Comcast complies with the relevant Commission and state and local rules relating to billing statements,¹⁸ but also has taken voluntary, proactive steps to make our bills more user-friendly. The re-design of the bill benefits consumers by providing them with information they have told us they want in a customer-tested, easy-to-read, and easy-to-follow format. Such enhanced voluntary disclosure also saves time and resources for the company by reducing the number of customer inquiries we receive regarding bill statements.

The primary goal of the re-design was to have one uniform bill format for residential customers nationwide. Prior to the re-design, the company had multiple bill formats in use across the country, and the bill's appearance and content differed based on local system implementation and the use of different billing vendors. The re-design process began in

¹⁸ See *infra* Section III.B.

February 2007, and roll-out of the re-designed bill, which started earlier this year, is now complete in nearly 80% of Comcast's footprint. Comcast aims for 100% roll-out by the end of the first quarter of 2010.

Based on feedback from customers and the experience of Comcast's customer care employees, Comcast launched the re-design initiative with the following principles in mind: (1) make pricing clear; (2) meet expectations (*i.e.*, anticipate what the customer expects to see and present information in a way that addresses those expectations); (3) make product and service descriptions clear, and eliminate acronyms and industry jargon so that everything is in plain language, whether English or Spanish; (4) present information in a way that reduces customer confusion and the resulting need for customers to call with questions or to dispute items that appear on bills; and (5) present a coherent and consistent message across all media, so that the information on bills matches information available on Comcast's website, in advertising and marketing materials, and through our CAEs.

A prototype bill incorporating the above principles was tested in surveys and focus groups, and the reformatted bill includes several new features in light of this feedback:

- *Treatment of pro-rated charges.* The new bill makes very clear when the customer has incurred charges for a partial month (*e.g.*, after initiating service) and provides information about such charges.
- *Treatment of promotions.* In the past, customers sometimes expressed surprise or confusion when a promotion ended and they "rolled off" to the non-promotional price, despite initial notice as described above. Now, the re-designed bill indicates when a promotional period is about to end.
- *Bundled services.* The "Service Details" portion of the new bill includes a more extensive description of bundled services so that customers are clear about which services are included in a bundled price and what fees, if any, apply to a particular service.

Comcast is providing customers with information about the re-designed bill in two ways. Some Comcast markets are providing customers with a pre-launch notice the month before,

including a bill insert describing the new bill format and pointing customers to a Comcast.com web page for more information.¹⁹ Other Comcast markets are providing an updated “how to read your bill” insert with the first new bill.²⁰

Customer reaction to the re-design has been positive. In focus groups and surveys, customers tell us that they now have a better understanding of the terminology used in our bills and of their pro-rated charges, and that they appreciate the larger, more readable font size. Furthermore, Comcast surveys in August 2009 indicated increased customer satisfaction from a year earlier in “ease of understanding” and “accuracy of charges.” Our CAEs also benefit from the re-designed bill: they can now find customer information more easily during customer calls.

The re-designed bills also are available to customers who manage their accounts online at Comcast’s website. The online version looks exactly like the bills mailed to customers. Approximately 16% of Comcast customers have chosen to receive their bill exclusively online through Comcast’s “Ecobill” program, and that percentage is expected to increase as more and more customers turn to the Internet to manage finances and services.

Comcast also is in the process of rolling out “customerCentral,” a new online portal that allows customers to view and pay their bill, access their account information, manage their services, and obtain help and support from a single website.²¹ The re-designed Internet portal has been under development for two years and incorporates extensive customer feedback to

¹⁹ See Explanation of Your Bill, at www.comcast.com/newbill.

²⁰ See Attachment D (containing a sample billing information mailing). It is Comcast’s practice to make billing statements available, upon request, in Braille or large-print format for the visually-impaired.

²¹ See Welcome to Comcast customerCentral, at <http://customer.comcast.com>. See also Attachment E (a screen shot of the new customerCentral portal).

ensure that it is as consumer-friendly as possible. Given that approximately 50% of Comcast customers today turn to Comcast's website to obtain answers to questions or resolve an issue, Comcast views it as a business imperative that our online services be designed effectively and in a consumer-friendly manner.

The "Help" section of customerCentral is designed to anticipate common areas of consumer confusion and provide easy-to-understand information.²² For instance, resources are organized in categories to address topics like billing questions and questions associated with each of Comcast's services (video, Internet, and voice). Customers are provided with a variety of ways to reach Comcast for additional support.

D. Customer Complaint And Dispute Resolution Practices.

1. Comcast Has Invested Substantial Resources In Improving Our Customer Care Practices.

CAEs are an important key to Comcast's success as a company. If they can communicate effectively and responsively with our customers, that will help build loyalty to our brand and improve customer satisfaction with our products and services. If, on the other hand, customer service is poor, customers are more likely to be unhappy with the service and switch providers. Comcast has approximately 24,000 CAEs, and customers can reach a Comcast representative 24/7 every day of the year.²³

As part of its effort to provide high-quality service, Comcast invests substantial resources in training our CAEs and technicians. Comcast University, our in-house training program,

²² See Comcast customerCentral, Help, at <http://customer.comcast.com/Pages/Help.aspx>. See also Attachment F (a screen shot of the customerCentral Help page).

²³ Comcast also has a special team to field questions regarding Comcast's voice service from hearing- and visually-impaired customers.

provides comprehensive instruction for CAEs, sales staff, and other customer care employees.²⁴

Moreover, Comcast's CAEs are subject to close supervision to ensure quality control.

Supervisors can monitor CAEs' actions and provide them with individually targeted feedback.

Additionally, Comcast provides CAEs with ongoing training and opportunities to update their skills.

Local systems have processes for resolving complaints and disputes, and the vast majority of complaints are, in fact, successfully resolved at the local level. Any outstanding complaint is routed to the corporate level for resolution. In addition, certain issues will initially be raised at the corporate level, and both the local systems and corporate team have trained personnel dedicated to resolving any customer complaints in an expeditious manner.²⁵

Comcast constantly monitors customer complaints and inquiries so that we can make necessary service improvements in particular markets or on a nationwide basis. Comcast's customer complaint and dispute resolution team runs monthly reports and analyzes the types and locations of complaints. Based on this data, we take proactive measures to reduce the incidence of similar complaints in the future. These reports are sent out to the local systems with a summary of trends and necessary areas of focus, if any. Internal surveys and tracking data are collected and analyzed to identify any strengths and weaknesses in customer service. Company executives, managers, and local systems are kept apprised of this information so that a data-driven approach is used to rectify any recurring issues.

²⁴ See Moving on Up, at <http://www.comcast.com/Corporate/About/Careers/whycomcast/Moving.html>.

²⁵ Customer complaints that are forwarded by the Commission to Comcast are resolved at the corporate level. Complaints typically are transmitted from the Commission to Comcast on a weekly basis; for each new complaint received, Comcast opens a ticket and sets a deadline for resolution (within 30 days).

2. Comcast Is Using Innovative New Technologies And Systems To Answer Questions, Fix Problems, And Respond To Customers' Needs.

Comcast has been an industry pioneer in the use of new communication tools to facilitate interactions with customers, allowing Comcast to listen to customers online and answer questions and solve problems in real-time. A dedicated staff of Comcast representatives monitors postings on sites across the Internet for mentions of problems with any Comcast service or process. Using Twitter, Facebook, MySpace, e-mail, blogs, and other electronic communication tools, Comcast representatives may contact the poster directly and attempt to resolve the problem immediately or ensure that resolution processes are underway. The most prominent example of this type of customer outreach is Frank Eliason's "Digital Care" effort, an innovative and effective customer service initiative that has generated extensive press and online interest.²⁶ Our Digital Care team has sent more than 102,000 public "tweets" and 37,000 private direct messages, and has helped over 100,000 customers using social media and blogs. This effort has been a clear success, as Comcast is able to resolve individual customers' issues and questions and also effectively disseminate information to a passionate and engaged customer following.

²⁶ See, e.g., Jason Meserve, *Twitter Is Now a Must in the Enterprise*, Network World, Feb. 16, 2009 ("Comcast . . . might be the standard when it comes to using Twitter to help customers in need. Long derided for bad customer service, the company is turning that around with its Twitter efforts. Twitter about any Comcast-related issue and you'll likely receive a reply in a few minutes asking if they can help."); Rebecca Reisner, *Comcast's Twitter Man*, Business Week, Jan. 13, 2009 ("[I] think it's safe to call Comcast's Frank Eliason the most famous customer service manager in the U.S., possibly in the world," due to his "maverick" idea to use Twitter to interact with customers); Jon Swartz, *Businesses Use Twitter to Communicate with Customers*, USA Today, June 26, 2009 (noting Comcast's "deft use of Twitter" and that "[i]n this emerging world, Frank Eliason is something of a legend. For more than a year, he has helped pioneer the use of Twitter as a customer-service resource"); Marilyn Much, *Corporate America Finding Tweet Smell Of Success On Twitter*, Investor's Business Daily, Aug. 11, 2009 (emphasizing that Comcast's Twitter efforts allow it to receive "a ton of feedback" from customers); Sean Ludwig, *10 Corporate Twitter Accounts Worth Following*, PCMag, Feb. 28, 2009 ("The official Comcast Twitter account is a useful extension of its customer service outlet.").

Comcast also monitors web posts concerning Comcast services and customers' interactions with Comcast across the Internet and aggregates this information to identify trends or useful data. These are analyzed and circulated within the company, and significant issues are addressed. The real-time feedback provided by online postings is very valuable; it allows Comcast to proactively address and resolve any issues that appear to be affecting multiple customers.

These web-based efforts are producing pro-consumer results. For example, the American Customer Satisfaction Index, which quantifies consumers' overall satisfaction with companies, showed a significant 9% annual increase in Comcast's score in the first quarter of 2009. The accompanying report linked the improvement, at least in part, to Comcast's innovative use of technology: "Over the past year, Comcast has used a novel approach in customer communications. The company monitors customer feedback on blogs and via the social networking site Twitter in order to identify disgruntled customers and address customer dissatisfaction on a one-to-one basis."²⁷

Comcast recognizes that social media and Internet-based customer service initiatives do not reach all customers, but the issues and trends identified through this interaction allow us to make changes that benefit all customers. Comcast ensures that managers and executives throughout the company are aware of any recurrent customer service issues by sharing social

²⁷ "ACSI Scores & Commentary, First Quarter 2009," *American Customer Satisfaction Index* (May 19, 2009), available at http://www.theacsi.org/index.php?option=com_content&task=view&id=194&Itemid=204.

media feedback “via a newsletter distributed to many leaders in the organization each and every day.”²⁸

In addition, Comcast has developed a new automated internal diagnostic and troubleshooting portal called Grand Slam. Grand Slam is central to Comcast’s strategy to reduce repeat customer calls and foster first-time resolution -- areas of particular importance to customers. Grand Slam gives agents more detailed and accurate information about customers’ accounts and enables agents to identify and fix potential service issues and to access a detailed history of any interaction with Comcast. Grand Slam allows agents to perform remote “health checks” of the services and equipment in customers’ homes, thereby pinpointing more accurately the source of a potential issue. In many cases, the issue can be resolved without sending a technician to the customer’s house. All CAEs who support Internet and voice products are now using Grand Slam, and the service is being introduced for video support as well.

The Comcast.com website provides many options for customers to seek help, share feedback, or raise concerns. Comcast has redesigned the Help and Support page to highlight the “6 Ways to Get Help,”²⁹ including expanded online customer forums to all customers on Comcast.com, online chat, email, a searchable keyword database, a toll-free phone number, and, when necessary, the ability to send an email directly to the head of Customer Care at Comcast.

²⁸ Jennifer Van Grove, *40 of the Best Twitter Brands and the People Behind Them*, Mashable.com, Jan. 21, 2009. See also Dan Turner, *Twitter Gets the Spotlight*, ComputerWorld, June 1, 2009 (noting that more than 3,000 workers get updates from Comcast’s Digital Care division about what the team has learned from social media interactions).

²⁹ See Help & Support, at <http://www.comcast.com/help>. See also Attachment G (a screen shot of “Help & Support”).

As noted above, with the introduction of customerCentral, Comcast customers will have another effective tool to obtain information and address any issues.³⁰

E. Customer Requests To Downgrade Or Terminate Service.

When a customer calls to downgrade or cancel service, Comcast ensures that the customer is aware of all available service options, including, for example, lower-priced services or packages. In the event that the customer decides to terminate his or her Comcast service, specially trained CAEs provide the customer with clear information about returning equipment and explain what the customer's final bill(s) will include. Customers are explicitly told that charges may apply if equipment is not returned to Comcast.

III. THE COMMISSION SHOULD MAINTAIN A LIGHT REGULATORY TOUCH IN THIS AREA.

The NOI invites comment on what steps the Commission can or should take to improve information disclosures to consumers. Comcast believes that the Commission has an important role to play in facilitating the flow of information from providers to consumers. However, in light of the strong marketplace incentives for facilities-based providers to disclose as much information as possible to consumers, and existing rules governing such disclosures, the Commission should exercise restraint in this area.

A. The Commission Has A Constructive Role To Play.

The Commission should continue its efforts to help educate consumers about communications services and choices. The Commission's website is a helpful resource, offering

³⁰ See Section II.C, *supra*.

a wide range of consumer education fact sheets and other publications.³¹ As the Commission redesigns its website, we urge it to make every effort to ensure that its educational resources for consumers are easily accessible and user-friendly.

The Commission also can play a helpful role in facilitating the resolution of customer inquiries and complaints. Although we encourage customers to contact us directly for timely resolution, Comcast routinely and promptly responds to inquiries and complaints that the Commission forwards, whether they allege Commission-cognizable issues or not. In this competitive marketplace, we always want to know about our customers' concerns and address them as quickly as possible. Comcast would welcome the opportunity to explore with the Commission ways to expedite the processing of customer inquiries and complaints. For example, the Commission, Comcast, and -- most importantly -- our customers would be better off if the Commission were to encourage customers to contact service providers initially before they lodge complaints with the Commission; a Comcast CAE may be able to address a problem more rapidly than if the customer communicates only through the Commission's website or call center. In the event that a consumer believes that he or she has exhausted remedies working directly with Comcast, we will then stand ready to address any complaint brought to our attention by the Commission. (Presumably, this preference for referring consumers to their service providers initially would apply to our competitors as well.)

³¹ See, e.g., FCC Consumer & Governmental Affairs Bureau, Consumer Publications, at http://www.fcc.gov/cgb/information_directory.html#internet (listing consumer fact sheets on cable, voice, and Internet issues, among other things). The FTC also provides consumers with educational information that helps them gain a better understanding of broadband and other services. See Shopping for Broadband: Satisfying Your Need for Speed, at <http://www.ftc.gov/bcp/edu/pubs/consumer/tech/tec17.shtm>.

There are other ways the Commission can help with information disclosures to customers. For example, as required by the Commission's rules, Comcast must provide a wide range of notifications to customers about service changes, privacy, and equipment compatibility issues, among other things. Comcast urges the Commission to consider ways to help make the notification process for all service providers simpler, more useful, and more consumer-friendly. In light of consumers' rapidly growing use of the Internet and the desirable trend towards more eco-friendly solutions, the Commission might consider encouraging providers to use the Internet, e-mail, and other paperless alternatives to provide routine information disclosures to consumers. Such alternatives are likely to be more convenient for consumers (so the disclosures are more likely to be read), and they can reduce the financial and environmental costs associated with traditional mailings that often go unread.

The Commission also can use this proceeding to consider the types of information disclosures that providers of Internet applications (whose service may be competitive or substitutable for those offered by providers subject to current rules and policies) are making to their customers and assess whether those practices are consistent with the Commission's consumer protection policies. The Commission cannot reasonably limit its inquiry to the practices of service providers who "charge" for their services or those who provide services using their own facilities; it must also consider those whose business models depend instead on monetizing information they collect on consumers' behavior and/or delivering them ads. Consumers have a legitimate interest in knowing how their web surfing is being tracked and how their search results are being prioritized, just as they do in knowing the characteristics of the traditional video, data, and voice services that they purchase. Consumers also have an interest in

knowing the terms and conditions of services provided by Internet-based applications and service providers just as they do from facilities-based service providers.

B. The Commission Should Exercise Restraint In Light Of Marketplace Incentives And Existing Regulations.

As noted, the marketplace already provides strong incentives for providers to keep their customers fully informed, and Comcast and other facilities-based service providers are meeting that business imperative.³² Apart from the vast resources provided by Comcast, consumers also have access to resources from third parties that provide tools allowing consumers to compare services and pricing. For instance, there are numerous comparison-shopping websites that help customers find, compare, and sign up for service plans from video, data, and voice providers in their service area. The websites typically include pricing information for individual services and service bundles, as well as educational information regarding factors that customers should consider when shopping for video, data, and voice services.³³ There also are numerous websites that provide technical assistance to customers, such as free tools for measuring Internet connection speeds.³⁴ The Commission should consider using its consumer information website to point consumers toward these resources.

³² See Section I, *supra*.

³³ Some examples of comparison-shopping websites include: <http://www.allconnect.com>; <http://broadbandnational.com>; <http://www.bundlemyservices.com>; <http://www.cablebundleoffers.com>; <http://www.cabledealfinder.com>; <http://www.connectmycable.com>; <http://www.digitallanding.com>; <http://www.highspeed-internet-providers.com>; <http://www.saveology.com>; <http://www.shopbroadband.com>; <http://www.telbay.com>; <http://www.whitefence.com>; <http://www.theispguide.com>; <http://www.dslreports.com>; <http://www.gobroadband.com>.

³⁴ See, e.g., www.speedtest.net; www.dslreports.com. Demonstrating our commitment to providing customers with full information, Comcast has launched a “speed test” tool for Comcast high-speed Internet customers that allows them to measure their Internet connection speeds. See Comcast Speed Test, at <http://speedtest.comcast.net>.

Moreover, current federal and state regulations already provide adequate protections to consumers. The FTC, the FCC, and the states have strong consumer protection safeguards and play clear roles in preventing fraud and deceptive practices. For example, under the FTC Act, advertisements must not be “unfair” or “deceptive,” which ensures that they must be truthful and not mislead consumers in ways that affect their behavior or decisions about a product or service.³⁵ The FTC has noted that it uses “its unfairness jurisdiction in a broad array of cases.”³⁶ The FCC also has authority under Title II of the Communications Act to curtail unfair and deceptive marketing practices by telecommunications carriers.³⁷ In addition, state attorneys general actively monitor advertising to ensure compliance with applicable consumer protection or other statutes.³⁸ Many states impose particular requirements (*e.g.*, font size requirements or certain disclosure requirements) that apply to all advertising, and Comcast complies with these

³⁵ See Comments of the Federal Trade Commission, GN Dkt. No. 09-51, at 9 (filed Sept. 4, 2009) (“An advertisement claim can be misleading if it contains a misrepresentation or omission that is likely to mislead consumers acting reasonably under the circumstances to their detriment. . . . In addition, advertising claims must be substantiated, especially when they concern performance attributes of the product or service.”). With regard to Internet service contracts, the FTC explained that contract-related claims can be “material” and subject to FTC oversight, “such as those relating to price, contract duration, and service purchase (*e.g.*, bundling of broadband Internet access with other services like video and telephone).” *Id.* The FTC has also explained that its oversight and enforcement activities require “accurate disclosure of material terms [that] allow[] consumers to compare similar services offered by one or multiple providers and weigh the different terms being offered in making decision about what services to purchase.” FTC Staff, *Broadband Competition Connectivity Policy* at 129 (June 2007), available at <http://www.ftc.gov/reports/broadband/v070000report.pdf> (“FTC Broadband Report”).

³⁶ FTC Broadband Report at 129.

³⁷ See *Business Discount Plan, Inc.; Apparent Liability for Forfeiture*, Order on Reconsideration, 15 FCC Rcd. 24396 (2000) (denying Petition for Reconsideration of FCC’s Section 201(b) jurisdiction over “unjust and unreasonable” marketing practices by common carriers in connection with communication service and asserting the FCC’s interest in preventing deceptive marketing practices). See also *Verizon California, Inc. v. FCC*, 555 F.3d 270 (D.C. Cir. 2009) (upholding the FCC’s authority under Section 222(b) to prevent telecommunications carriers from using competitively sensitive information for marketing purposes).

³⁸ See, *e.g.*, *New Jersey Sues Verizon Over Deceptive FiOS Marketing*, ConsumerAffairs.com, Mar. 19, 2009, available at http://www.consumeraffairs.com/news04/2009/03/nj_fios_complaints.html.

laws. Put simply, the existing regulatory scheme ensures that consumers receive fair and accurate information.³⁹

The Commission has established additional customer service standards and rules. For example, pursuant to its Section 632 authority, the Commission adopted a comprehensive set of customer service standards for cable services,⁴⁰ including detailed billing information requirements now codified in Section 76.1619 of the Commission's rules.⁴¹ The Commission also specifies requirements for cable operators to provide customers with written notice as to billing and complaint procedures,⁴² rate and service changes,⁴³ and billing requirements for refunds and credits.⁴⁴ Section 632 directs that that these rules be enforced by local franchising

³⁹ Also, as noted *supra*, Comcast and its competitors monitor one another's advertising and routinely challenge -- both formally and informally -- advertisements and marketing materials that they consider unclear. That process is very productive in ensuring higher quality advertising with clearer messages.

⁴⁰ See *Implementation of Section 8 of the Cable Television Consumer Protection and Competition Act of 1992, Consumer Protection and Customer Service*, Report and Order, 8 FCC Rcd. 2892 (1993) ("*Consumer Protection Order*").

⁴¹ 47 C.F.R. § 76.1619. There are no similar customer service standards for non-cable MVPDs, such as DirecTV or Dish Network.

⁴² *Id.* § 76.1602(b)(6). This provision details additional information a cable operator must provide each subscriber at the time of installation of service and at least annually. *Id.* § 76.1602(b)(1) – (5) (requiring operator to provide subscribers with written information on products and services, prices and options for programming services, installation and service maintenance policies, instructions on how to use the cable service, and channel positions of programming).

⁴³ *Id.* § 76.1603.

⁴⁴ *Id.* § 76.309(c)(3). Commission rules allow cable operators to separate as line items on billing statements the "amount of any other fee, tax, assessment, or charge of any kind imposed by any governmental authority[.]" *Id.* § 76.985(a)(3). Comcast uses this approach on all billing statements and clearly identifies applicable government fees and taxes as separate line items.

authorities⁴⁵ and also authorizes state and local governments to establish their own requirements in this area.⁴⁶

The NOI notes that the Commission has “truth-in-billing” rules that apply to providers of wireline and wireless voice services, and asks whether it should extend those rules to interconnected VoIP providers.⁴⁷ Comcast believes such additional rules are unnecessary. As a new entrant in the voice marketplace competing with well-established incumbent LECs, Comcast (and other VoIP providers) would risk a significant competitive disadvantage if its bills were not at least as clear and informative as its rivals’. In fact, whether a customer is receiving voice or any other Comcast service, the customer’s billing statement complies with the Commission’s core truth-in-billing principles: all bills are “clearly organized,” contain “brief, clear, non-misleading, plain language description of the service or services rendered,” and include “clear and conspicuous disclosure of inquiry contacts.”⁴⁸

⁴⁵ See 47 U.S.C. § 552(a); *see id.* § 552(b) (giving the Commission the authority to establish standards but not to enforce them). *See also Consumer Protection Order* ¶ 19 (“As a result, it does not appear that Congress intended for the Commission to bear the responsibility of enforcing the new FCC standards. In addition, we believe that as a practical matter, customer service requirements can be enforced most efficiently and appropriately on a local level where such enforcement historically has occurred. Accordingly, we conclude that the customer service standards we adopt today should be enforced by local franchise authorities.”); FCC Cable Television Fact Sheet: Where to File Complaints Regarding Cable Television Service, <http://www.fcc.gov/mb/facts/complain.html> (directing consumers to contact local franchising authorities with questions and complaints concerning customer service and billing, among other issues).

⁴⁶ 47 U.S.C. § 552(d)(1)-(2). For example, certain state and local governments have established billing-related requirements. *See, e.g.,* Arlington County, VA Code § 41.2-9(f)(2); Carroll County, MD Code of Ordinances § 93-16; Illinois Cable and Video Customer Protection Law, 220 ILCS 5/70-501(c); Conn. Gen. Stat. § 16-333-9e; New Jersey Administrative Code § 14:18-3.7.

⁴⁷ *See* NOI ¶ 18.

⁴⁸ 47 C.F.R. § 64.2401(d).

C. Mandating Further Disclosures Risks Doing Consumers More Harm Than Good.

Customers want easy-to-understand, bottom-line disclosures, and requiring companies to provide additional information may make disclosures overly complex and needlessly confusing to consumers. As Cass Sunstein, currently the Administrator of the federal Office of Information and Regulatory Affairs, has noted, regulators must consider the “pervasive risk of information overload, causing consumers to treat a large amount of information as equivalent to no information at all.”⁴⁹ Likewise, Joseph Farrell, Director of the Bureau of Economics at the Federal Trade Commission, recently told the FCC that “[n]ot everything can be prominently disclosed,” adding that “if everything is in 14-point type, it really doesn’t help.”⁵⁰

Numerous empirical studies on human cognition support the notion that there is a limit to the amount of information consumers are able to process effectively at a given time.⁵¹ This body of research suggests that forcing consumers to handle excessive amounts of information can

⁴⁹ Cass R. Sunstein, *Informing America: Risk, Disclosure, and the First Amendment*, 20 FLA. ST. U. L. REV. 653, 668 (1993); see also Melvin Aron Eisenberg, Comment, *Text Anxiety*, 59 S. CAL. L. REV. 305, 307 (1985) (“Consumers may respond to too much information not by overloading, but by refusing to load any information at all.”).

⁵⁰ Howard Buskirk, *Justice, FTC Economists Say FCC Should Avoid Static Definitions in Broadband Plan*, Communications Daily, at 7, Oct. 13, 2009.

⁵¹ See James R. Bettman *et al.*, *Constructive Consumer Choice Processes*, 25 J. CONSUMER RES. 187-210 (1998) (discussing the information-processing approach to the study of consumer choice, which endorses the notion that decision makers have limitations on their capacity of processing information); Jacob Jacoby, *Perspectives on Information Overload*, 10 J. OF CONSUMER RES. 432, 435 (1984) (finding that, when confronted with excessive information, consumers tend to examine only a small portion of the information that is available to them); Kevin Lane Keller & Richard Staelin, *Effects of Quality and Quantity of Information on Decision Effectiveness*, 14 J. CONSUMER RES. 200, 200–01, 211–12 (1987) (finding that the presence of too much information leads to decreases in decision effectiveness); Naresh K. Malhotra, *Information Load and Consumer Decision Making*, 8 J. CONSUMER RES. 419, 427 (1982) (finding that excessive information provision had dysfunctional effects on consumers); see also, e.g., Geraint Howells, *The Potential and Limits of Consumer Empowerment by Information*, 32 J. L. & SOC’Y. 349, 359–60 (2005) (noting that consumers have limited ability to understand and process information, and that research suggests that the human mind can handle, at most, seven “chunks” of information at one time).

either “overload” their information processing capacities⁵² or trigger simplifying strategies that lead them to exclude relevant information.⁵³ In either case, giving too much information to consumers who do not want it may cause them to make poorer decisions with the information presented or, worse still, to ignore the information altogether.⁵⁴ The Commission should thus be wary of further increasing the amount and complexity of information with which consumers will be confronted. Service providers are in the best position to determine what information is most important to their customers, and they should retain the flexibility to develop practices that disseminate key information to customers in effective and efficient ways, while making it possible for customers who want more details to get them.

The Commission requested comment about industry-wide standardized disclosures, such as those found on food labels or credit card statements.⁵⁵ Comcast believes it is useful to review

⁵² See, e.g., Kevin Lane Keller & Richard Staelin, *supra* note 51, at 212 (finding that consumers may be unable “to shield themselves from being overloaded when ‘too much’ information is made readily available”); Naresh K. Malhotra, *supra* note 51, at 427 (finding that “empirical investigation revealed dysfunctional effects of information overload” when respondents were presented with too many product alternatives or too much information regarding product attributes); Susanna Kim Ripken, *The Dangers and Drawbacks of the Disclosure Antidote: Toward a More Substantive Approach to Securities Regulation*, 58 BAYLOR L. REV. 139, 160 (2006) (“Evidence suggests that when people are given too much information in a limited time, the information overload can result in confusion, cognitive strain, and poorer decision making.”).

⁵³ See, e.g., Melvin Aron Eisenberg, Comment, *supra* note 49, at 307 (“Consumers may respond to too much information not by overloading, but by refusing to load any information at all.”); Jacob Jacoby, *supra* note 51, at 435 (finding that, when confronted with excessive information, consumers tend to examine only a small portion of the information that is available to them); Troy A. Paredes, *Blinded by the Light: Information Overload and its Consequences for Securities Regulation*, 81 WASH. U. L. Q. 417, 440–43 (2003) (noting that information search and processing costs increase as more information becomes available, and that a person might consequently use less information, fail to focus on the most relevant information, and ultimately make an inferior decision).

⁵⁴ See, e.g., Melvin Aron Eisenberg, *supra* note 49, at 307 (noting that providing too much information can harm consumers by “unduly rais[ing] the costs of observing the information in which they are interested”); see also Aleecia M. McDonald & Lorrie Faith Cranor, *The Cost of Reading Privacy Policies*, INFO. SOC’Y J. L. & POL’Y, at 4, available at <http://www.scribd.com/doc/7550344/Cost-of-Reading-Privacy-Policies> (discussing research by behavioral economists demonstrating that people are unlikely to read privacy policies if the cost of doing so (in terms of time, for example) is too high).

⁵⁵ See NOI ¶ 47.

the workability of this concept in this proceeding. As our comments demonstrate, we disclose an abundance of information to consumers, and we are open to suggestions about even more consumer-friendly ways to disseminate information. However, the Commission must consider whether uniform information disclosure mandates are well-suited for the vibrant and complex communications industry. In contrast to products or industries where such standardized disclosures are useful for consumers, *e.g.*, where information, like the ingredients in a box of cereal or the interest rate on a credit card, is static and lends itself to easy comparison, it is not clear that standardized disclosures would benefit consumers in the communications marketplace, where new products, services, and pricing arrangements are being introduced at a rapid pace. For example, it is unclear whether a standardized approach could clearly and concisely capture the myriad packages, products, and services available to consumers today in the video, data, and voice markets while still giving providers the flexibility to introduce innovative products and services. Rather, there is a significant risk that a standardized approach could tie the hands of service providers, result in less innovation, and perhaps even create consumer confusion.

D. A Cautious Approach Is Also Warranted Due To Jurisdictional And First Amendment Considerations.

The Commission's authority to regulate in this area is properly constrained. For example, the Communications Act includes no customer service mandates for high-speed Internet providers. Where, in contrast, Congress has authorized the Commission to adopt consumer protection rules, it has done so explicitly.⁵⁶ Moreover, although the Commission has

⁵⁶ See, *e.g.*, 47 U.S.C. §§ 552 (Consumer Protection and Customer Service) & 551 (Protection of Subscriber Privacy); *see also id.* §§ 222 (Privacy of Customer Information), 228 (Pay-Per-Call Services), 255 (Access by Persons with Disabilities) & 258 (Illegal Changes in Subscriber Carrier Selection ("Slamming") and Truth-in-Billing).

certain additional powers under Title I, the reach of those powers remains a matter of uncertainty, and the Commission has generally exercised great restraint in using them.⁵⁷ The Commission should take a similarly cautious approach here given that Comcast and other providers already have strong marketplace incentives to disclose extensive information to consumers.⁵⁸

Likewise, regulations in this area also would raise potential First Amendment issues. While Comcast agrees that the government has an interest in seeing that consumers can make “intelligent and well-informed commercial decisions in an increasingly competitive marketplace,”⁵⁹ it is questionable whether additional government regulation is needed to advance that interest given current marketplace conditions and given the regulation that already exists.

⁵⁷ See, e.g., *In re Vonage Holdings Corporation Petition for Declaratory Ruling Concerning an Order of the Minnesota Public Utilities Commission*, Memorandum Opinion and Order, 19 FCC Rcd. 22404 ¶ 34 n.118 (2004) (“Although the Commission has clear authority to do so, it has only rarely sought to regulate information services using its Title I ancillary authority.”); see also *In re Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as amended by the Cable Television Consumer Protection and Competition Act of 1992*, Report and Order and FNPRM, 22 FCC Rcd. 5101 (2007), Dissenting Statement of Commissioner Michael J. Copps (“I believe it is the better course of wisdom in so far-reaching a proceeding . . . to thoroughly answer those questions [about the Commission’s legal authority to act], to lay out the basis of our claimed legal authority, and to explain what legal risks this action entails before taking action.”). Restraint is also warranted in light of recent court decisions overturning Commission rules promulgated under its Title I authority. See, e.g., *American Library Ass’n v. FCC*, 406 F.3d 689 (D.C. Cir. 2005) (overturning broadcast flag rules); *MPAA v. FCC*, 309 F.3d 796 (D.C. Cir. 2002) (overturning video description rules).

⁵⁸ The Supreme Court has recognized that the Commission’s ancillary authority is limited and should be exercised cautiously. See, e.g., *United States v. Southwestern Cable Co.*, 392 U.S. 157, 178 (1968) (finding the Commission has ancillary jurisdiction when: (1) the issue involves interstate communication by wire or radio and is therefore covered by Title I’s general jurisdiction grant; and (2) the regulation is reasonably ancillary to the effective performance of the Commission’s various Congressionally-delegated responsibilities); *United States v. Midwest Video Corp.*, 406 U.S. 649, 676 (1972) (Burger, C.J., concurring) (“Candor requires acknowledgment, for me at least, that the Commission’s position strains the outer limits of even the open-ended and pervasive jurisdiction that has evolved by decisions of the Commission and the courts.”); *United States v. Midwest Video Corp.*, 440 U.S. 689, 706 (1979) (“Though afforded wide latitude in its supervision over communication by wire, the Commission was not delegated unrestrained authority.”).

⁵⁹ NOI ¶ 21.

IV. CONCLUSION

Comcast urges the Commission to acknowledge that the competitive marketplace for video, data, and voice services creates strong incentives for Comcast and other providers to disclose as much information as possible to customers. In light of this marketplace-driven imperative, and the existing regulations in this area, the Commission should exercise restraint in considering any additional disclosure requirements.

Respectfully submitted,

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ATTACHMENT A

Our commitment to you.

.....
The Comcast Customer Guarantee
.....



The Comcast Customer Guarantee

We are committed to providing you with a consistently superior customer experience. If for any reason something goes wrong, we will work to resolve the issue as quickly and professionally as we can.

We make the following guarantees:

1. We will give you a 30-day, money-back guarantee on all our services.

If you're not satisfied and wish to cancel service for any reason, you can do so in the first 30 days and get your money back. Simply return all equipment in good working order and we'll refund the monthly recurring fee for your first 30 days of service and any charges you paid for standard installation.

2. We will treat you and your home with courtesy and respect.

Our technicians will clearly display their Comcast identification when they arrive at your home. They will be trained and equipped to complete the job on the first visit. Our Customer Account Executives will be courteous and knowledgeable when you contact us.

3. We will answer your questions at your convenience.

You can contact us 24 hours a day, 7 days a week regarding any service-related issue by calling **1-800-COMCAST** or in any of the following ways:

- Online via Ask Comcast
- Live Chat online with a Comcast technician
- Online Community Forum
- Send us an email and receive a response within 24 hours

4. We will offer easy-to-understand packages and provide you with a clear bill.

Our packages are designed to be straightforward. A call or visit to our website makes it easy to find a package that's right for you. We aim for the same clarity with our bills. You may view your monthly statement and service details anytime by visiting **www.comcast.com**.

5. We will continually offer the best and most video choices.

We're working hard to bring more choices to our customers instantaneously by using the full power of our advanced network and decades of television experience. We will use On Demand to bring customers dramatically more content choices, including more movies, more sports, more kids' programs, more network TV shows and more HD than anyone else.

6. We will quickly address any problem you may experience.

After the first visit to your home, if we do not satisfactorily complete installation or can't resolve a routine issue, we will extend a complimentary service to your account. Additionally, we won't charge you for a service visit that results from a Comcast equipment or network problem.

7. We will schedule appointments at your convenience and be mindful of your time.

As a courtesy, we will call you before we arrive at your home. And if we fail to arrive for a scheduled visit during the appointment window, we will credit \$20 to your account.*

* Subject to any local restrictions or requirements.

..... We're here to help.

Every Comcast employee is dedicated to meeting the commitments of our guarantee and to exceeding your expectations. We are working very hard to serve you better and listen carefully to your feedback. If you have any thoughts or ideas about this Guarantee or about your experience with us, we invite you to share them with us by visiting **www.comcast.com**.

To learn more about your Comcast products and services, visit us online at **comcast.com/welcome** for 24/7 online support, or give us a call at **1-800-COMCAST**.

Thank you for choosing Comcast.

Since 1963, Comcast has been dreaming big. We bring exciting products and unparalleled choice to customers across America with our state-of-the-art video, high-speed Internet, phone and online services. We push the boundaries of innovation and creativity because we want to exceed your expectations.



Comcast High-Speed Internet

Visit comcast.net to access broadband features, including music, games and video clips.



Comcast Digital Cable

Movies, kids shows and more — ready when you are with On Demand.



Comcast Digital Voice®

Unlimited local and long-distance calling, 12 calling features plus voice mail — all for one low price.

ATTACHMENT B

[Learn](#)[Shop](#)[Programming](#)[Customers](#)[About](#)

English

Your location: 20009 | [Reset](#)

Search Comcast.com

[SEARCH](#)[1 Products](#)[2. Customize](#)[3. Customer Info](#)[4. Installation](#)[5. Review & Submit](#)[Faster Internet](#)[Better TV](#)[Smarter Phone](#)[Bundles](#)[Questions? Call 1-877-870-4310.](#)[Triple Play](#) | [Double Play \(Internet & TV\)](#) | [Double Play \(Internet & Voice\)](#)

Value Plus Triple Play

NEW SUBSCRIBERS: Get the Value Plus Triple Play for only \$99 a month for 12 months.

- Over 80 digital cable channels.
- Thousands of On Demand movies and shows.
- Internet speeds that are way faster than DSL.
- The McAfee Security Suite (\$120 value).
- Unlimited local calling – rated #1 in call clarity.
- 12 popular calling features including Caller ID, Call Waiting and more.

[View Channel Line-up](#)
[Minimum System Requirements](#)
[View International Rates](#)
[Terms and Conditions](#)
[Learn More](#)



Special Comcast.com Price!

\$99.00

for the first 12 months
\$114.99 per month thereafter

[Add to my cart](#)

HD Starter Triple Play

Free HD, tons of free movies with On Demand and up to 12Mbps Internet speeds with PowerBoost®.

- About 100 digital cable channels.
- Downloads up to 12Mbps, uploads up to 2Mbps with PowerBoost®.
- All the speed you need for downloading music and movies, and uploading photos and streaming video.
- Unlimited local and long-distance nationwide calling.
- Rated #1 in call clarity* thanks to our enhanced fiber-optic network.
- 12 popular calling features including Caller ID, Call Waiting and more.
- Visual voice mail that lets you see who called so you can listen to the most important messages first.

*Based upon an independent study performed by Keynote dated November, 2008, Wave 6 Study.

[View Channel Line-up](#)
[Minimum System Requirements](#)
[View International Rates](#)
[Terms and Conditions](#)
[Learn More](#)



Special Comcast.com Price!

\$114.99

for the first 12 months
\$129.99 per month thereafter

Shopping Cart

Your Cart is currently empty

Current Comcast Customers

Add new products or upgrade existing products. It's easy and convenient.

[LEARN MORE](#)

More About Comcast Bundles

[Digital Cable Channel 1 On Demand](#)
[Protection with McAfee Security Suite](#)
[Comcast Digital Voice® 12 Popular Features \(plus voice mail\)](#)

ATTACHMENT C

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English

Your location: 20009 | [Reset](#)

Search Comcast.com

[SEARCH](#)[1. Products](#)[2. Customize](#)[3. Customer Info](#)[4. Installation](#)[5. Review & Submit](#)

If the information below is correct, click on **Start Live Chat** to begin a chat session with a Comcast representative. This is the final step to complete your order. If you would like to make changes, please select **Edit** from the appropriate section.

[Start Live Chat](#) Questions? Call 1-877-870-4310.**Current Comcast Customers**

Add new products or upgrade existing products. It's easy and convenient.

[LEARN MORE](#)**Step 1** Review Your Customer Information [edit](#)**Billing Contact:**

MR JOHN CUSTOMER

Billing Address:

Same as service address

Service Address:**Step 2** Review Your Order Summary [edit](#)

	One-time Fees	Promotional Price*
Value Plus Triple Play	\$79.90	\$99.00 for 12 months
I have to lease an EMTA modem	-	\$3.00
SUB TOTALS	\$79.90	\$102.00

TOTAL \$181.90*

Your first bill will be higher than usual to account for any installation charges or yearly subscriptions. Your subsequent bills will reflect your regular monthly charges. **Your 2nd month bill will be approximately \$102.00.**

Monthly Charges: \$117.99 per month after 12 months

Step 3 Review Your Installation Request [edit](#)

ATTACHMENT D

Go green.

You can also choose to go paperless with Comcast's EcoBill™ process —freeing you up from the clutter of another bill in your mailbox. Simply go to www.comcast.com/ecobill and sign up. With just a few clicks of your mouse you can start receiving the exact replica of your paper statement online. Saving the environment has never been so easy.

We're here to help! To learn more about your Comcast service or any of our additional services, visit us online at comcast.com/welcome for 24/7 online support, or give us a call at 1-800-COMCAST.

Not all products available in all areas. Contact us for availability. ©2008 Comcast.

X25400



Comcast Digital Voice®

Unlimited local and long-distance calling, 12 calling features plus voice mail — all for one low price.



Comcast Digital Cable

Movies, kids' shows and more — ready when you are with ON DEMAND.



Comcast High-Speed Internet

Visit comcast.net to access broadband features, including music, games and video clips.

Making life a little less complicated!

Your Comcast bill just got a whole lot friendlier.

Comcast.

The new simpler, clearer and friendlier bill.

We know it takes more than great products and entertainment to deliver a great customer experience. With larger type size and the right level of detail, we redesigned our bill to make it easier for you to quickly find the important information you need. This Quick Reference Guide explains the key areas of your new monthly bill, so you can get back to the entertainment you love.

If you have any questions, visit comcast.com/welcome for 24/7 online support or give us a call at **1-800-COMCAST**.

Features to note:

- “One-Stop Shop” Box:** The first place to go to get important information like your account number, amount due and due date.
- Contact Us:** Chat and e-mail support are available 24/7.
- Monthly Statement Summary:** Your payments and new charges.
- New Charges Summary:** A breakdown of your new charges for the current billing period.
- News From Comcast:** Look here for important information about your account, products and services.
- Savings info:** If you're taking advantage of our promotions or discounts, we'll show you how much you're saving.
- Payment coupon:** Simply tear it off and mail it in with your check or money order. Better yet, go to Comcast.com and sign up for automatic payments with Comcast PayDirect!
- Service Details:** Details of all new charges for the current billing period.
- Partial Month Charges & Credits:** If you add, change or remove a service during your billing cycle, any partial month charges or credits are here, along with a brief description of what changed.

This is the first page of a Comcast bill. It features the Comcast logo at the top left. A green box at the top right contains account information: Account Number 9999 11 222 0000002, Bill Date 05/15/08, Total Amount Due \$149.04, and Payment Due by 05/08/08. Below this, a green box labeled '2' contains contact information: www.comcast.com and 1-800-COMCAST. The main body of the bill is divided into sections: 'NE Subscriber' with service details, 'News from Comcast' with a thank you message and a link to Comcast.com, 'Monthly Statement Summary' showing previous balance, payment, and new charges, 'New Charges Summary' listing various services and their costs, and a green box at the bottom stating 'You saved \$57.06 this month with your Comcast services!'. A green box at the bottom right contains a payment coupon with the account number and a space for the amount enclosed.

This is the second page of a Comcast bill. It features the Comcast logo at the top left. A green box at the top right contains account information: Account Number 9999 11 222 0000002, Bill Date 05/15/08, Total Amount Due \$149.04, and Payment Due by 05/08/08. Below this, a green box labeled '8' contains service details: Comcast Bundled Services, Additional Cable Television Services, Additional High-Speed Internet Services, and Additional Comcast Digital Voice Services. A green box at the bottom right contains a payment coupon with the account number and a space for the amount enclosed. The bottom of the page contains a list of Comcast locations and a section for the Franchise Authority.

ATTACHMENT E

[Sign In](#)[comcast.com](#) | [comcast.net](#) | [contact Comcast](#)

Search

[Home](#) | [Account & Bill](#) | [Users & Settings](#) | [TV](#) | [Internet](#) | [Voice](#) | [Help](#)

Welcome to Comcast customerCentral

The one place where you can view and pay your bill, and manage all your Comcast product features and settings. If you are new here, you can quickly set up your Comcast profile and start managing your products and services. If you are a repeat visitor or are a Comcast High-Speed Internet customer click sign in and enter your user name and password to get started.

[Register for access](#)

Sign In

Top 5 FAQs

- [How do I make a one-time payment online?](#)
- [Can I view my bills online?](#)
- [If I signed up for Comcast's Ecobill process, how will I be notified of my monthly bill or that my ebill is available for viewing?](#)
- [How do I cancel automatic payments?](#)
- [How do I pay my bill in Comcast Customer Central?](#)

Resources

Ask Comcast

Click, Ask, Answer, how easy is that? An interactive service, Ask Comcast is available 24/7 to answer questions.

Moving?

We offer worry free service transfer.

Security Channel

Your one stop for resources to keep you and your family safe online.

My knowledge center

Save time. Save trees. Enroll in Comcast's Ecobill™ process today and say goodbye to checks, stamps, envelopes and even your paper bill.

[Register for paperless billing](#)

Want to record your favorite show? Our interactive tutorial will get you started in no time. [Learn more](#)

Protecting your family online has never been easier. The Comcast Security Channel has everything you need to keep safe, including the award winning McAfee® Security Suite. [Learn more](#)

Did you know?

Comcast offers the McAfee Security Suite – a \$120 value – at no additional cost with your Comcast High-Speed Internet subscription!

[Learn more](#)

Comcast's Smartzone is your communications headquarters.

[Learn more](#)[Add Comcast Services](#)[Faster High-Speed Internet](#)[Digital Cable](#)[Digital Voice](#)[High Definition TV](#)

ATTACHMENT F



Help With Your Comcast Bill

Get answers to the most frequently asked questions about Comcast billing and payments.

Go

Top Billing FAQs

- [How do I make a one-time payment online?](#)
- [Can I view my bills online?](#)

[More Billing FAQs](#)



Help With High-Speed Internet

Learn how to set up email, download the McAfee Security Suite, and use other benefits of your high-speed Internet service.

Go

Top High-Speed Internet FAQs

- [What can I do from my Email toolbar in the SmartZone Communications Center?](#)
- [Getting started with Personal Web Pages](#)

[More High-Speed Internet FAQs](#)



Help With Cable TV

Get step-by-step instructions on how to use the on-screen guide, DVR, HDTV, remote control, and so much more.

Go

Top Cable TV FAQs

- [Why won't my Digital Cable remote control respond when I press a button?](#)
- [Troubleshooting Your HDTV](#)

[More Cable TV FAQs](#)



Help With Comcast Digital Voice®

Learn everything you need to know about making calls, using your calling features, and accessing the Digital Voice Center.

Go

Top Digital Voice FAQs

- [Accessing the Digital Voice Center](#)
- [Why am I not receiving Universal Caller ID pop-up messages on my PC?](#)

[More Digital Voice FAQs](#)

Contact Us



Ask Comcast

An interactive Q & A tool available 24 hours a day, 7 days a week.



Live Chat

Chat with a Comcast Customer Service Representative now.



E-Mail Us

Send us an e-mail and a customer service representative will respond within 24 hours.



Phone

1-800-COMCAST (1-800-266-2278)

Manage Comcast Accounts

Log in to [Manage your Account](#)

- [Change Password](#)
- [Add/Remove Email Accounts](#)
- [Enable/Edit Personal Web Pages](#)
- [Setup Autoreply](#)
- [Spam Filtering](#)

Manage your account

Log in to [View and pay your bill](#)

- [View and pay our bill](#)
- [See recent account activity](#)
- [Reset your Comcast Digital Voice PIN](#)

View/Pay your bill

Don't Have an Account? Sign up now for an account with Comcast. [Go](#)

Resources

Help & Support Forums

Ask questions, get answers or just browse the Comcast Help Forums.

Outage Board

Check Network Health specific to your area.

Desktop Doctor

Download the Desktop Doctor to help keep you connected to the Internet.

Moving?

It's easy to set up or transfer your phone, Internet and cable services.

Payment Centers

Access a list of locations where you can pick up or exchange your Comcast equipment.

Security

Learn more about the Comcast tools that help keep your home computers safe, protected and virus-free.

Outdated Cable Modem Replacement

Arrange to have an outdated cable modem replaced.

ATTACHMENT G

MANAGE
COMCAST
ACCOUNTSSign In to
Comcast.com

- View and pay your bill
- Update your account
- See recent account activity
- Reset your password

SIGN IN TO COMCAST.COM >

Not registered?
[Create an account](#) with
Comcast.com.

Sign In To
Comcast.net

SIGN IN TO COMCAST.NET >

Manage your e-mail
accounts and internet
settings.

Six Ways to Get Help



Hi, I'm Rick Germano, head of Customer Operations at Comcast.

We're here to help you with any questions you have.

If you need help or information, choose one of six different ways to contact us.

[Read a letter from Rick](#)

[Ask Comcast](#)

Enter your question into our interactive Q&A tool.
Available 24 hours a day, 7 days a week.

[Live Chat](#)

Chat with a Comcast Customer Service Representative now.
Available 24 hours a day, 7 days a week.

[Ask the Comcast Community](#)

Log in to our online forum, post your question and get answers from fellow Comcast customers and moderators.
Available 24 hours a day, 7 days a week.

[Email Us](#)

If you didn't find what you need through Live Chat or Ask Comcast, send us an e-mail.
We'll respond within 24 hours.

Phone

Call 1-800-COMCAST (1-800-266-2278).
Available 24 hours a day, 7 days a week.

[Do you have feedback?](#)

We want to hear your feedback! E-mail Rick.

RESOURCES

[Comcast Customer Guarantee](#)

If for any reason something goes wrong, we will work to resolve the issue as quickly and professionally as we can.

[Moving?](#)

Get phone, Internet and cable into your new home without pulling a muscle.

[Comcast Locations](#)

Need to make a payment or return/exchange equipment? Find your local service center.

[Customer Agreements/Policies](#)

Read our privacy notice, customer agreement and other important notices regarding our service.

[Security](#)

Get help with Internet safety and security right here.

[Customer Care Improvements](#)

Here at Comcast, providing excellent customer service to you is our #1 priority.

Comcast Business Class Customers:

If you have a question about your service, please call 1-800-316-1619.